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9
10 Attorneys for Plaintiff Mei-Fang Wang

11
12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**

14
15 MEI-FANG WANG, an individual,

16 Case No. SC06-03472 SBA

17 Plaintiff,

18
19 **STIPULATION AND [PROPOSED]**
20 **ORDER RE STAY OF**
21 **PROCEEDINGS DURING**
22 **SETTLEMENT NEGOTIATIONS**

23 vs.

24
25 CHIUNG YEN CHI, an individual;
26 CHIN CHAN CHI, an individual; and
27 DOES 1 through 50, inclusive,

28 Defendants.

19
20 **STIPULATION**

21 IT IS HEREBY STIPULATED by and between Plaintiff MEI-FANG
22 WANG, ("Plaintiff") and Defendants CHIUNG YEN CHI and CHIN CHAN
23 CHI (collectively, "Defendants") who have appeared in the above-entitled-action
24 that:

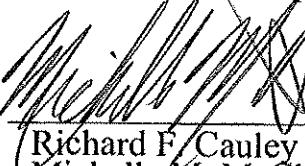
25 • The parties have essentially reached a settlement of this Action.
26 • Due to scheduling conflicts between the parties and the fact that
27 Plaintiff is currently out of the country, the parties agree to stay this

1 Action for one month to allow the parties to finalize the settlement
2 and dismiss this Action.

3 • The case is dismissed with prejudice, however, if any party hereto
4 shall certify to this court, within thirty (30) days, with proof of
5 service of a copy thereof, that the agreed consideration for said
6 settlement has not been delivered over, the foregoing order shall
7 stand vacated and this cause shall fall forthwith be restored to the
8 calendar to be set for trial.

9
10 Dated: 20 Mar, 2007

WANG, HARTMANN & GIBBS
A Professional Law Corporation

11
12 By: 

13
14 Richard F. Cauley
15 Michelle M. McCliman
16 Attorneys for Plaintiff

17 Dated: 3.20, 2007

18
19 PILLSBURY WINTHROP SHAW
20 PITMAN, LLP

21 By: 

22 Vernon H. Granneman
23 Attorney for Defendants

24
25
26 ORDER

27 Based upon the Stipulation of the parties who have appeared in the above-
28 entitled Action,

1
2 IT IS HEREBY ORDERED:

3 XXXXX The above proceedings are hereby stayed for thirty (30) days from
4 the date of this Order. SBA

5 2. The case is dismissed with prejudice, however, if any party hereto
6 shall certify to this court, within thirty (30) days, with proof of service of a copy
7 thereof, that the agreed consideration for said settlement has not been delivered
8 over, the foregoing order shall stand vacated and this cause shall fall forthwith be
9 restored to the calendar to be set for trial.

10
11
12 IT IS SO ORDERED.

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14
15 Dated: MARCH 22, 2007

16 
17 Sandra Brown Armstrong
18 United States District Judge

PROOF OF SERVICE [CCP 1013A(3)]

STATE OF CALIFORNIA, COUNTY OF ORANGE

I am employed in the County of Orange, State of California, am over the age of eighteen (18), and not a party to the within action. My business address is: 1301 Dove Street, Suite 1050, Newport Beach, California 92660.

On March 20, 2007 I served the foregoing document, described as

**STIPULATION AND [PROPOSED] ORDER RE STAY OF PROCEEDING
DURING SETTLEMENT NEGOTIATIONS**

on the interested parties in this action

XXX by placing the true copies thereof (or the original where required by law) enclosed in sealed envelopes addressed as follows:

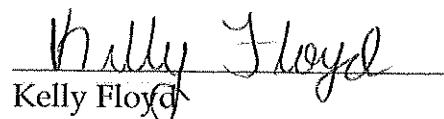
Vernon H. Granneman
Pillsbury Winthrop Shaw Pittman, LLC
2475 Hanover Street
Palo Alto, CA 94304

XXX BY U.S. MAIL - I caused such envelope to be deposited in the United States Mail, First Class Postage Prepaid at Newport Beach, California on March 20, 2007.

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. It is deposited with the United States Postal Service on that same day, in the ordinary course of business. I am aware that on motion of the parties served, service is presumed invalid if the postal cancellation date, or postage meter date, is more than one day after the date of deposit for mailing in the affidavit.

XXX I declare that I am employed in the office of a member of the Bar of this Court, at whose discretion the service was made.

XXX I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct. Executed on March 20, 2007, at Newport Beach, California.


Kelly Floyd